

EXHIBIT Q

DEFENDANTS' AFFIRMATIVE DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	DESIGNATIONS				
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at
1/22/2019	All Def Affirm	4	12	4	24
1/22/2019	All Def Affirm	7	17	7	19
1/22/2019	All Def Affirm	9	17	9	25
1/22/2019	All Def Affirm	10	3	10	6
1/22/2019	All Def Affirm	10	15	10	19
1/22/2019	All Def Affirm	10	24	11	5
1/22/2019	All Def Affirm	11	9	11	11
1/22/2019	All Def Affirm	29	19	30	22
1/22/2019	All Def Affirm	30	25	32	6
1/22/2019	All Def Affirm	32	16	32	20
1/22/2019	All Def Affirm	33	14	33	20
1/22/2019	All Def Affirm	37	9	37	12
1/22/2019	All Def Affirm	37	14	38	10
1/22/2019	All Def Affirm	38	12	38	12
1/22/2019	All Def Affirm	43	15	43	20
1/22/2019	All Def Affirm	44	20	45	10
1/22/2019	All Def Affirm	45	17	45	20
1/22/2019	All Def Affirm	45	22	45	23
1/22/2019	All Def Affirm	47	16	47	21
1/22/2019	All Def Affirm	49	1	49	9
1/22/2019	All Def Affirm	49	11	49	15
1/22/2019	All Def Affirm	49	17	50	11
1/22/2019	All Def Affirm	50	14	50	14
1/22/2019	All Def Affirm	64	16	65	14
1/22/2019	All Def Affirm	67	12	67	17
1/22/2019	All Def Affirm	87	8	87	19
1/22/2019	All Def Affirm	87	21	87	22
1/22/2019	All Def Affirm	98	20	100	6
1/22/2019	All Def Affirm	100	22	101	2
1/22/2019	All Def Affirm	101	4	101	8
1/22/2019	All Def Affirm	101	10	101	13
1/22/2019	All Def Affirm	101	15	101	25
1/22/2019	All Def Affirm	102	3	102	8
1/22/2019	All Def Affirm	102	11	102	11
1/22/2019	All Def Affirm	104	9	104	12
1/22/2019	All Def Affirm	109	7	109	17
1/22/2019	All Def Affirm	109	19	110	18
1/22/2019	All Def Affirm	110	21	111	15
1/22/2019	All Def Affirm	121	2	121	8
1/22/2019	All Def Affirm	121	11	121	14
1/22/2019	All Def Affirm	125	6	125	14
1/22/2019	All Def Affirm	125	16	126	6
1/22/2019	All Def Affirm	126	9	126	14
1/22/2019	All Def Affirm	128	3	128	7
1/22/2019	All Def Affirm	128	9	128	18
1/22/2019	All Def Affirm	128	23	129	21
1/22/2019	All Def Affirm	131	6	131	24
1/22/2019	All Def Affirm	135	1	135	4
1/22/2019	All Def Affirm	135	23	136	1
1/22/2019	All Def Affirm	136	4	136	12
1/22/2019	All Def Affirm	136	14	136	14
1/22/2019	All Def Affirm	136	25	137	4
1/22/2019	All Def Affirm	137	6	137	6

DEFENDANTS' AFFIRMATIVE DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	DESIGNATIONS				
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at
1/22/2019	All Def Affirm	137	8	137	10
1/22/2019	All Def Affirm	138	1	138	19
1/22/2019	All Def Affirm	140	20	141	8
1/22/2019	All Def Affirm	141	10	141	25
1/22/2019	All Def Affirm	142	2	142	2
1/22/2019	All Def Affirm	143	10	144	6
1/22/2019	All Def Affirm	157	7	157	10
1/22/2019	All Def Affirm	158	8	158	12
1/22/2019	All Def Affirm	174	18	174	22
1/22/2019	All Def Affirm	174	24	175	12
1/22/2019	All Def Affirm	175	15	175	15

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS						
DEPO DATE	PLAINTIFFS' OBJECTIONS				DEFENDANTS' RESPONSES	
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
1/22/2019	4	12	4	24	Cover page, not a proper designation	Exhibits 1-4 were designated with corresponding testimony within the transcript as well
1/22/2019	9	17	9	25	Relevance	Withdraw designation
1/22/2019	10	3	10	6	Relevance	Withdraw designation
1/22/2019	10	15	10	17	Relevance	Relevant to witnesses' employment history with Summit County
1/22/2019	10	18	10	19	Relevance	Withdraw designation
1/22/2019	10	24	11	5	Relevance	Withdraw designation
1/22/2019	11	9	11	11	Relevance	Withdraw designation
1/22/2019	29	19	30	22	Foundation; misstates prior testimony; argumentative; completeness; witness' full answer omitted	Inclusion of 29:19 - 30:13 resolves foundation objection and unfounded objection regarding the characterization of the witness' answer; 29:19 - 30:13 not required for completeness of this question and answer; no argument; witness' full answer was included
1/22/2019	30	25	32	6	Completeness	See objection to counter designation (32:7-13). The portion of the answer omitted from this designation is not responsive to the question.
1/22/2019	32	16	32	20	Completeness	The only portion of the question that was not included in the designation was attorney colloquy; the question and answer are complete
1/22/2019	33	14	33	20	Foundation; misstates prior testimony; speculation; argumentative	Not speculation as witness was testifying based on his personal knowledge; not a misstatement of previous testimony; witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	37	14	38	10	Foundation; misstates testimony; argumentative; speculative	Not speculation as witness was testifying based on his personal knowledge; not a misstatement of previous testimony; witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	38	12	38	12	Foundation; argumentative	witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	43	15	43	20	Foundation; argumentative	witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	44	20	45	10	Foundation; argumentative; completeness	Witness testified to role at SCCS so appropriate foundation; no argument included in designation; see also testimony designated at 30:20 - 32:6, 33:14-20
1/22/2019	45	17	45	20	Foundation; argumentative	Witness testified to role at SCCS so appropriate foundation; no argument included in designation; see also testimony designated at 30:20 - 32:6, 33:14-20
1/22/2019	49	1	49	9	Speculation; foundation; hearsay	Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	49	11	49	15	Foundation; hearsay; speculation	Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	49	17	50	11	Foundation; speculation; hearsay	Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	50	14	50	14	misstates testimony; argumentative; foundation	no testimony being characterized, so no misstatement; no argument included in designation; Witness testified to role at SCCS so appropriate foundation
1/22/2019	64	16	65	14	Relevance; foundation	Withdraw designation
1/22/2019	67	12	67	17	Relevance; foundation	Withdraw designation
1/22/2019	87	8	87	19	Speculation; foundation; argumentative; prejudicial	Witness testified to role at SCCS, and specifically to his knowledge regarding budgting issues (98:20 - 99:4) so appropriate foundation; question asking about witness' recollection and knowledge pertaining to his direct involvement in issue discussed, so no speculation; no argument included in designation; probative value of evidence of negative public image (and related causes) of SCCS outweighs any prejudice
1/22/2019	87	21	87	22	Foundation; speculation	Witness testified to role at SCCS, and specifically to his knowledge regarding budgting issues (98:20 - 99:4) so appropriate foundation; question asking about witness' recollection and knowledge pertaining to his direct involvement in issue discussed, so no speculation
1/22/2019	98	20	100	6	Calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	100	22	101	2	Argumentative; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; no argument included in designation
1/22/2019	101	4	101	8	Foundation; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS						
DEPO DATE	PLAINTIFFS' OBJECTIONS					DEFENDANTS' RESPONSES
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
1/22/2019	101	10	101	13	Foundation; argumentative; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; no argument included in designation
1/22/2019	101	15	101	25	Relevance; calls for expert opinion on State funding of SCCS	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding
1/22/2019	102	3	102	8	Relevance; foundation; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding
1/22/2019	102	11	102	11	Foundation; relevance; speculative	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding; witness testifying to his knowledge, so no speculation
1/22/2019	104	9	104	12	Relevance; completeness; 403	Testimony is relevant as it goes to the issue of the SCCS budget and sources of funding for SCCS; probative value of testimony outweighs any prejudice
1/22/2019	109	7	109	17	Speculation; foundation; calls for expert testimony	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; witness testified to role at SCCS so appropriate foundation; question asks about witness' personal knowledge so no speculation
1/22/2019	109	19	110	18	Foundation; argumentative; misstates testimony	Witness testified to role at SCCS so appropriate foundation; no argument included in designation; no characterization of testimony so does not misstate testimony
1/22/2019	110	21	111	15	Relevance; argumentative; foundation	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; no characterization of testimony, so does not misstate testimony; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	125	6	125	14	Relevance; foundation; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	125	16	126	6	Foundation; relevance; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	128	3	128	7	Foundation; compound; argumentative	Witness testified to role at SCCS and knowledge regarding impact of drugs on SCCS, so appropriate foundation; no compound; no argument included in designation
1/22/2019	128	9	128	18	Relevance	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and staffing cuts made in 2008/2009 as a result of the recession
1/22/2019	128	23	129	21	Relevance	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and staffing cuts made in 2008/2009 as a result of the recession
1/22/2019	131	6	131	24	Relevance; completeness; argumentative	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and budgetary cuts made in 2008/2009 as a result of the recession; no argument included in designation
1/22/2019	135	1	135	4	Foundation; completeness	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation
1/22/2019	135	23	136	1	Foundation; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting and staffing issues so appropriate foundation; no argument included in designation
1/22/2019	136	4	136	12	Argumentative	no argument included in designation
1/22/2019	136	25	137	4	Foundation; argumentative; calls for expert testimony	Witness testified to role at SCCS and issues impacting the number of children in custody so appropriate foundation; no argument included in designation; testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	137	8	137	10	Calls for expert opinion	testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	138	1	138	19	Calls for expert testimony	Testimony authenticates and identifies Exhibit No. 4, no expert or lay opinions included

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS						
DEPO DATE	PLAINTIFFS' OBJECTIONS					DEFENDANTS' RESPONSES
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
1/22/2019	140	20	141	8	Compound; argumentative; calls for expert testimony	No compound; no argument included in designation; testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	141	10	141	25	Compound; argumentative; relevance	No compound; no argument included in designation; testimony and accompanying exhibit No. 4 is relevant as it goes to the issue of staffing and budgetary cuts made by SCCS that were unrelated to opioids and left a deficit in resources for the agency
1/22/2019	143	10	144	6	Calls for expert testimony; relevance	Testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions; testimony is relevant as it goes to the issue of staffing and budgetary cuts made by SCCS that were unrelated to opioids and left a deficit in resources for the agency and other causes of increased workload
1/22/2019	157	7	157	10	Incomplete answer designated; completeness; fact could be stipulated	Improper objection (fact could be stipulated); remaining portion of answer (157:11 - 158:7) is nonresponsive
1/22/2019	158	8	158	12	Argumentative; foundation; misstates testimony	Foundation established 157:7-10; no argument included in designation; no prior testimony characterized
1/22/2019	174	18	174	22	Relevance; argumentative; calls for expert testimony	Testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions; testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; no argument included in designation
1/22/2019	174	24	175	12	Relevance; argumentative; speculation	testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; testimony regarding witness' personal knowledge, so not speculative; no argument included in designation
1/22/2019	175	15	175	15	Relevance; argumentative; speculation	testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; testimony regarding witness' personal knowledge, so not speculative; no argument included in designation

PLAINTIFFS' COUNTER DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	PLAINTIFFS' COUNTER DESIGNATIONS				
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at
1/22/2019	Plaintiff Counter	23	6	29	4
1/22/2019	Plaintiff Counter	29	9	29	18
1/22/2019	Plaintiff Counter	30	23	32	15
1/22/2019	Plaintiff Counter	32	7	32	15
1/22/2019	Plaintiff Counter	33	21	35	15
1/22/2019	Plaintiff Counter	33	21	36	3
1/22/2019	Plaintiff Counter	39	2	42	7
1/22/2019	Plaintiff Counter	42	12	43	10
1/22/2019	Plaintiff Counter	45	11	45	16
1/22/2019	Plaintiff Counter	45	25	47	25
1/22/2019	Plaintiff Counter	47	22	48	7
1/22/2019	Plaintiff Counter	86	1	86	5
1/22/2019	Plaintiff Counter	100	7	100	21
1/22/2019	Plaintiff Counter	104	13	104	25
1/22/2019	Plaintiff Counter	104	13	104	24
1/22/2019	Plaintiff Counter	121	2	121	15
1/22/2019	Plaintiff Counter	121	2	121	14
1/22/2019	Plaintiff Counter	131	25	132	17
1/22/2019	Plaintiff Counter	135	5	135	12
1/22/2019	Plaintiff Counter	135	23	136	14
1/22/2019	Plaintiff Counter	145	11	145	14
1/22/2019	Plaintiff Counter	157	11	158	7
1/22/2019	Plaintiff Counter	173	12	173	18

DEFENDANTS' OBJECTIONS TO PLAINTIFFS' COUNTER DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	DEFENDANTS' OBJECTIONS				
	Begin Page at	Begin Line at	End Page at	End Line at	DEFENDANTS' OBJECTIONS
1/22/2019	23	6	24	8	NR; 402; 403
1/22/2019	24	10	29	4	NR; 402; 403; INC
1/22/2019	29	9	29	18	402
1/22/2019	32	7	32	13	NR
1/22/2019	32	15	32	15	COL
1/22/2019	33	21	35	15	NR; 402; 602
1/22/2019	35	16	36	3	402
1/22/2019	39	2	41	23	602; NR; 40:19 - 41:23 subject of pending motion in limine
1/22/2019	42	12	43	10	602; NR
1/22/2019	45	11	45	16	NR: CML
1/22/2019	46	21	47	14	NR
1/22/2019	104	13	104	24	NR
1/22/2019	131	25	132	17	NR
1/22/2019	135	5	135	12	INC
1/22/2019	157	11	158	7	NR
1/22/2019	173	12	173	18	NR; 402; 403